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September 4, 2019

**VIA ELECTRONIC FILING (Public Version) and**  
**VIA HAND DELIVERY (Confidential Version)**

The Honorable Jocelyn G. Boyd  
Chief Clerk/Administrator  
The Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, South Carolina 29210

**Re: South Carolina Energy Freedom Act (House Bill 3659) Proceeding Related to  
S.C. Code Ann. Section 58-37-40 and Integrated Resource Plans  
Docket No. 2019-225-E (Duke Energy Progress, LLC)**

Dear Mrs. Boyd:

Pursuant to S.C. Code § 58-37-40, enclosed for filing is Duke Energy Progress, LLC's ("DEP" or "Company") 2019 Integrated Resource Plan Update ("2019 DEP IRP Update").

Due to the commercial sensitivity and proprietary nature of certain information being filed in support of this 2019 DEP IRP Update, DEP respectfully requests that the Commission find that pursuant to S.C. Code Ann. § 30-4-40(a), Confidential Table 2 located on Page 113 is exempt from disclosure under the Freedom of Information Act, S.C. Code Ann. § 30-4-10 et seq. and 10 S.C. Code Ann. Regs. § 103-804(S)(2). The information contained in Table 2 located on Page 113 reflects DEP's anticipated future costs to procure additional energy and/or capacity. The wholesale electricity market is extremely competitive, and in order for the Company to obtain the most cost-effective energy and capacity to meet the needs of its customers, it must protect from public disclosure its projected and actual cost to procure such energy, capacity, or both. In addition, if this information was publicly available, potential suppliers would know the price against which they must bid, and rather than bidding the lowest price possible, they could simply bid a price low enough to beat the Company's projections to the detriment of customers. DEP also notes that additional information is required by the North Carolina Utilities Commission for the 2019 DEP IRP Update as found in Exhibit A (pages 115 through 122), which includes information associated with the Renewable Energy Portfolio Standard in North Carolina. Exhibit A lists all of DEP's renewable energy credit ("REC") contracts, including counterparty and estimated RECs. This information needs to be kept confidential as it affects current negotiations on REC contracts.

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Public disclosure of this information would harm DEP's ability to negotiate and procure cost-effective purchases and discourage potential bidders from participating in requests for proposals.

Accordingly, the Company is filing the confidential version of the 2019 DEP IRP Update which includes Confidential Table 2 on Page 113 and Confidential Exhibit A (pages 115-122) under seal and respectfully requests that the Commission maintain this information as confidential pursuant to Commission Order No. 2005-226.

In addition to the 2019 DEP IRP Update being electronically filed with the Commission, we are also hand-delivering copies of the 2019 DEP IRP Update containing the Confidential information to the Commission and the Office of Regulatory Staff ("ORS") as well as hand-delivering a public version to the State Energy Office.

Please do not hesitate to contact me if you have any questions or require any further information.

Sincerely,



Heather Shirley Smith

Enclosure

C: Parties of Record  
S.C. State Energy Office